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July 28, 2020

VIA ECF

The Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: ***Giuffre v. Dershowitz, Case No. 19-cv-3377-LAP***
Rule 45 Subpoenas to Leslie Wexner and John Zeiger

Dear Judge Preska:

I write on behalf of Plaintiff Virginia Giuffre in response to Defendant Alan Dershowitz's July 23, 2020 letter requesting a pre-motion conference concerning the Subpoenas issued by Defendant to Leslie Wexner and John Zeiger. Although Plaintiff is not the target of these Subpoenas, she respectfully submits this letter in her capacity as the party-Plaintiff and because of her interest in the documents and depositions being sought.

Defendant has put Leslie Wexner at the heart of his false and defamatory claims that Plaintiff and her counsel were engaged in an extortion plot to extract money from wealthy associates of Jeffrey Epstein by allegedly falsely naming the Defendant. As Plaintiff enumerates in her Amended Complaint in this action, Defendant has defamed her by falsely asserting on multiple occasions to numerous different audiences that he "was 'deliberately framed for financial reasons.'" D.E. 117 at ¶ 17. In Defendant's Amended Answer and Counterclaims, he details this alleged extortion plot and identifies Mr. Wexner as the target of this alleged scheme. D.E. 127 at ¶ 23. For this reason, Plaintiff was likewise planning on seeking relevant documents and testimony from Mr. Wexner and Mr. Zeiger. Plaintiff, therefore, respectfully requests that the Court allow these depositions to proceed, but believes that the details, such as the schedule and format, can be worked out among the parties.

Respectfully,

/s/ Charles J. Cooper
Charles J. Cooper

cc: Counsel of Record